



May 9, 2025

To:

(OMB) Office of Management and Budget, Attn: Desk Officer for SSA

(SSA) Social Security Administration, OLCA, Attn: Reports Clearance Director

Submitted via Regulations.gov

Re: Social Security Administration's Emergency Request on Phone-Based Services

(Docket No: SSA-2025-0014)

The Center for Democracy & Technology (CDT) respectfully submits these comments to the Office of Management and Budget (OMB) and the Social Security Administration (SSA) on their emergency request for information regarding their updated approach for certain phone-based services. CDT is a nonprofit, nonpartisan 501(c)(3) organization that advocates for civil rights and civil liberties in the digital age. Among other issues, CDT works to ensure that government services and benefits are delivered efficiently while protecting people's privacy and civil rights, including specifically disabled people, many of whom rely on benefits administered by SSA.

CDT supports SSA's commitment to protecting programs and beneficiaries from fraud, and to its primary mission of effectively delivering benefits to those who are entitled to them.

Unfortunately, as detailed in its recent emergency request, SSA has hastily revoked a longstanding means to verify identity to minimize fraud, which is likely to lead to the denial of benefits for legitimate recipients.

In its emergency request, SSA details a more restrictive, less accessible verification process for beneficiaries seeking to make changes such as updating their payment method via SSA's phone services, requiring them to use an online account or visit an SSA field office. Unfortunately, this hurried change and the absence of an equally accessible alternative is likely to be non-viable for many of SSA's most vulnerable beneficiaries, including people with disabilities and older individuals – the precise populations that SSA programs are intended to serve and who disproportionately experience difficulties with using technology and traveling to in-person offices.

These populations are disproportionately likely to struggle with technology access for various reasons. These include lack of [reliable access to technology or the internet](#), an [inability to access certain websites](#) or digital materials, or [discomfort with technology](#). These are also populations for whom visiting an SSA office may not be viable, whether because beneficiaries [live too far from an office](#), they [lack accessible transportation](#), [their disability or age makes travel difficult](#), or they are physically unable to stand in line for the period of time that many field office visits require.

While it is important to evolve fraud mitigation efforts to keep pace with advances in technology, and we appreciate SSA's interest in modernizing its systems, it is crucial to ensure that in doing so customer service options remain accessible. Rather than rushing to implement an

exclusionary framework without making available an equally accessible alternative, SSA should take a more concerted, community-based approach to identifying methods for fraud reduction. This includes robust stakeholder engagement, considering less prohibitive solutions that will not undermine the agency's mission, and allowing for alternate avenues for vulnerable beneficiaries who struggle with technology and/or travel.

These solutions could include strategies that are already at use elsewhere in the government, or in industry, such as out-of-band approaches like mailing the PIN number to a [registered address](#) as an alternative to requiring a MySSA account to access the PIN, use of identity verification services [through the post office](#), verifying the [inbound call](#) or calling the beneficiary back on a [known number](#), or [after-the-fact approaches](#) like heightened scrutiny for accounts that have relied on phone services. These approaches could satisfy SSA's desire to mitigate fraud and minimize overpayments while still securing access to benefits for those who are entitled to them.

If SSA does determine that the approach of requiring an online account or in-person visit is necessary, such a change should only come *after* the establishment of mitigating techniques designed to ensure continued access to benefits, particularly for beneficiaries who may be unfamiliar with online account services or unable to visit physical offices without significant hardship. These mitigations, such as specialized call center staff trained to help users create online accounts, need to be in place and appropriately vetted *before* these changes are made, to ensure that beneficiaries do not experience a disruption of critical services.

Finally, an emergency request does not allow for substantial engagement from stakeholders, particularly those who directly represent the communities that will be impacted by these changes. This is particularly concerning given that prior feedback on a similar plan highlighted the numerous accessibility challenges of this plan, challenges that SSA itself then [acknowledged as prohibitive](#). Further engagement with stakeholder groups, including those that represent disabled and older beneficiaries, could help surface the impact these types of changes have on beneficiaries and provide critical insights on what sorts of other solutions would ensure that SSA's programs remain available to those who need them. SSA should clarify why it believes the current situation is an emergency, as its own reports have found that [less than 1% of payments](#) made between 2015-2022 were improper.

Social Security benefits are a critical lifeline for millions of Americans. We appreciate the opportunity to submit these comments, and look forward to continuing to collaborate on these valuable efforts.

Respectfully submitted,

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